

7
FILEDUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NOV 18 2014

CLERK'S OFFICE-DETROIT
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

Indictment No. 06-20663-15

v.

Honorable Avern Cohn

ROBERT SILLS,

Defendant.

MOTION FOR REDUCTION OF SENTENCE UNDER
18 U.S.C. SECTION 3582(c)(2)

The defendant, ROBERT SILLS, pro se, pursuant to 18 U.S.C. Section 3582(c)(2), requests a reduction of sentence based on retroactive Guideline Amendment 782 (effective November 1, 2014), for the reasons set forth below:

I. JURISDICTION

The Court has jurisdiction over the instant motion under Section 3582(c)(2) because it is based on retroactive Guideline Amendment 782, which lowered the defendant's sentencing range in effect at the time of the original sentencing on June 28, 2010.

II. REASONS FOR GRANTING A SENTENCE REDUCTION UNDER
SECTION 3582(c)(2)

1. The defendant's guideline range at the time of sentencing on June 28, 2010, was 121 to 151 months, based on "an Offense Level of 32 and a Criminal History Category of I". (Sentencing Transcript at p. 3). Amendment 782 reduces the

defendant's Offense Level to 30, yielding a guideline range of 97 to 121 months.

2. The defendant has made significant efforts toward post-conviction rehabilitation, completing a number of programs offered by the Bureau of Prisons, such as, Creative Business, Employment Opportunity, Heating and Air-Conditioning, Vocational Training, Pre-Release Anger Management, Pre-Release Anxiety Management, and Commercial Driving License (CDL) Course. (See Exhibit A, attached). The Supreme Court held in Pepper v. United States, 562 U.S. ____ (2011), that post-conviction rehabilitation is an approved ground for a reduction of sentence.

III. CONCLUSION

The defendant requests that the Court grant his request for reduction of sentence and impose a sentence at the bottom of his guideline range based on his continuing effort at postconviction rehabilitation.

Respectfully submitted,



ROBERT SILLS, Pro Se
33½ Pembroke Road
Danbury, CT 06811

Dated: November 12, 2014

DEFENDANT'S EXHIBIT A



Name: SILLS, ROBERT
Register Number: 33957-044
Security/Custody: LOW/IN
Projected Release: 06-15-2029 / GCT REL

Institution: DANBURY FCI
ROUTE 37
DANBURY, CT 06811
Telephone: (203) 743-6471
Fax: 700-642-9071

Next Review Date:
Next Custody Review Date: 03-26-2015
Age/DOB/Sex: 40 / 08-18-1973 / M
CIM Status: Y
Profile Comments:

Driver's License/State: /
FBI Number: 405069MA2
DCDC Number:
INS Number:

EDUCATION DATA

Facility	Assignment	Description	Start Date	Stop Date
DAN	GED HAS	COMPLETED GED OR HS DIPLOMA	11-28-2011	CURRENT
DAN	ESL HAS	ENGLISH PROFICIENT	11-28-2011	CURRENT

COMPLETED EDUCATION COURSES

Course Description	Completion Date	Course Hours
CREATIVE BUSINESS RPPCT6	03-18-2014	18
EMPLOY OPPORTUNITY T,TH RPPCT2	12-19-2013	36
HVAC V/T 12:30-3:30PM RPP CT2	02-05-2013	230
PRERELEASE ANGER MANAGEMENT	01-02-2013	12
PRERELEASE ANXIETY MANAGEMENT	10-16-2012	12
CDL,TUE&WED, 1830-2030 CT2	02-01-2012	16

HIGH TEST SCORES

Test	Subtest	Score	Test Date	Test Facl	Form	State
Inmate has no score history items in this area						

WORK DATA

Facility	Assignment	Description	Start Date	Stop Date
DAN	REC PM	REC ORDERLY/AIDE PM SHIFT	07-15-2014	CURRENT

WORK HISTORY

Facility	Assignment	Work Assignment Description	Start Date	Stop Date
CAA	H/O UNASSG	HOLD OVER UNIT	06-16-2014	06-17-2014
BML	EDUC	EDUCATION	09-05-2013	05-28-2014

DISCIPLINE HISTORY

UDC / DHO	Hearing Date	Report No.	Prohibited Act / Description	Sanction
Inmate has no disciplinary history items in this area				

PROOF OF SERVICE

This is to certify that a copy of the foregoing Motion
For Reduction of Sentence Under 18 U.S.C. Section 3582(c)(2)
has been mailed to Michael C. Leibson, Asst. U.S. Attorney,
211 W. Fort Street, #2300, Detroit, MI 48226, this 12th day
of November, 2014.



ROBERT SILLS



↔33957-044↔
Clerks Office
Theodore Levin
231 W Lafayette BLVD
Room 564
Detroit, MI 48226
United States

FEDERAL CORRECTIONAL INSTITUTION DANBURY

33 1/2 PEMBROKE ROAD, DANBURY CT. 06810

DATE:

11/21/14

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